## **EXHIBIT 4**

## COVINGTON

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## Gary M. Rubman

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Via Email December 12, 2018

Jonathan Jacobs Zobrist Law Group, PLLC 1900 Arlington Boulevard, Ste B Charlottesville, VA 22903

Re: VGT v. Castle Hill Studios, et al., Case No. 4:17-cv-00454-GKF-JFJ

**Dear Jonny:** 

We write in response to your December 4 email identifying designations in Mr. Williamson's deposition transcripts that CHG continues to believe should be de-designated. After considering the designations further, VGT is willing to re-designate the following portions of the transcript from Highly Confidential to Confidential:

- 23:13-24:16
- 25:3-11
- 25:16-27:11

All other designations should remain the same as set forth in our November 28 letter.

To help us better understand CHG's views regarding how the confidentiality standards set forth in the Protective Order should be applied, please explain CHG's basis for designating the entirety of both of Mr. Sprinkle's deposition transcripts, as well as all exhibits used in both depositions, as Highly Confidential. To the extent that CHG no longer believes that the transcripts and exhibits should be designated Highly Confidential in their entirety, please either re-designate or de-designate those materials.

To the extent that CHG has further concerns about the designations with respect to Mr. Williamson's deposition, please explain those concerns and provide dates for a meet and confer. In advance of any such meet and confer, please also respond to the question we first asked on November 20: why has Castle Hill chosen to raise concerns about the designations in the Williamson transcripts at this time? Relatedly, with whom do you intend to share the materials?

Sincerely,

Gary M. Rubman